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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS, INC.'S MOTION TO
EXCLUDE EXPERT TESTIMONY AND
OPINIONS OF JOSEPH FARRELL**

Hearing Date: July 24, 2025
Time: 10:00 a.m.
Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration
4 in support of Meta's Motion to Exclude Expert Testimony and Opinions of Joseph Farrell.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript
6 from Joseph Farrell's merits deposition, held on March 15, 2024.

7 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Expert
8 Merits Report of Joseph Farrell, dated January 12, 2024.

9 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Expert
10 Merits Rebuttal Report of Joseph Farrell, dated February 9, 2024.

11 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Expert
12 Merits Report of Dennis Carlton, dated January 12, 2024.

13
14 I declare that the foregoing is true and correct under penalty of perjury.

15 Executed on this 28th day of April, 2025, in New York, New York.

16 By: /s/ David Z. Gringer
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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta